## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI

SHARON OWEN,,	)	
Plaintiff,	)	
VS.	)	Case No. 2:11-cv-04258-FJG
BRISTOL CARE, INC., d/b/a BRISTOL MANOR, and d/b/a ASHBURY HEIGHTS, a	) (nd	
d/b/a, THE ESSEX, et al.,	)	
Defendant	)	

## MOTION TO STAY PROCEEDINGS AND COMPEL ARBITRATION

COMES NOW Defendant Bristol Care, Inc., by and through its undersigned attorneys, and moves this Court for an Order compelling arbitration of the claims alleged in Plaintiff's Complaint. In support of its motion, Defendant refers the Court to its Suggestions in Support, filed contemporaneously herewith, which are incorporated herein by reference.

WHEREFORE, Defendant Bristol Care, Inc. respectfully requests that the Court grant its motion and enter an Order to compel arbitration between the parties, as required by the parties' contract, to stay this litigation pending arbitration and for such other and further relief as the Court deems just.

Respectfully submitted,

LATHROP & GAGE LLP

/s/ Shelley I. Ericsson

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ATTORNEYS FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of November, 2011, I electronically submitted the foregoing to the Clerk of the Court via e-mail for filing and uploading to the CM/ECF system which will send a notice of electronic filing to:

John Campbell Ryan Keane The Simon Law Firm, P.C. 800 Market St., Suite 1700 Saint Louis, MO 63101

Attorneys for Plaintiff

/s/ Shelley I. Ericsson
An Attorney for Defendant